

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
NORTHERN DIVISION

ABRIELLE LONDO,)	
)	Case No.: 2:20-cv-53
Plaintiff,)	
)	U.S. District Judge:
v.)	Hon. Paul L. Maloney
)	
ENRIGHT FAMILY RESTAURANTS,)	U.S. Magistrate Judge:
INC., and STEPHEN WHELAN,)	Hon. Maarten Vermaat
)	
Defendants.)	
)	

DEFENDANTS' REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF

NOW COME Defendants, Enright Family Restaurants, Inc. and Stephen Whelan, by and through their attorneys, Numinen, DeForge & Toutant, P.C., and for Defendants' Requests for Production of Documents to Plaintiff, state the following:

Pursuant to Federal Rules of Civil Procedure 26 and 34 Plaintiff Abrielle Londo shall, within thirty (30) days, produce copies of the following documents at 105 Meeske Ave., Marquette, MI 49855.

The term "documents" is defined to have the same meaning and to be equal in scope to the terms "documents" and "electronically stored information" as used in Federal Rule of Civil Procedure (34)(a).

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please produce all documents in your possession referring or relating to Steven Whelan in any way.

2. Please produce all documents in your possession referring or relating to Enright Family Restaurants, Inc. in any way.

3. Please produce all curriculum vitae for all expert witnesses you intend to call at the time of trial.

4. Please produce any and all photographs relating to the allegations in Plaintiff's Complaint.

5. Please produce any and all mobile phone/smart phone screenshots, including but not limited to screen shots of text messages, relating in any way to the allegations in Plaintiff's Complaint or Defendants' defenses.

6. Please produce any and all photographs or video recordings you may introduce at the time of trial.

7. Please produce any and all written correspondence, emails, and text messages relating to the allegations in Plaintiff's Complaint.

8. Please produce any and all written correspondence, emails, and text messages sent to Defendant for any reason.

9. Please produce a legible copy of any and all Documents upon which you intend to rely at any hearing in this case or at the trial.

10. Please execute and return the attached authorizations for the release of health, employment and other information.

11. Provide a copy of all documentation referenced in Plaintiff's Initial Disclosures.

12. Provide a copy of any other documentation, in any format, that Plaintiff intends to use in support of her claims.

Respectfully submitted,

Numinen, DeForge & Toutant, P.C.

Date: February 12, 2021

s/ Phillip B. Toutant

PHILLIP B. TOUTANT (P72992)

Attorney for Plaintiff

105 Meeske Ave.

Marquette, MI 49855

(906) 226-2580

PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon the attorneys of record of all parties to the above cause of action by mailing via U.S.P.S. First Class Mail, of the same to them at their respective business addresses as disclosed by the pleadings of record herein on February 12, 2021.

s/ Lauren A. Peters

LAUREN A. PETERS
NUMINEN, DeFORGE & TOUTANT, P.C.